



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

March 8, 1991

Mr. Robert Swale
U.S. Environmental Protection Agency
230 S. Dearborn Street
Chicago, Illinois 60604

Re: American Chemical Services,
Griffith, IN
Comments on Remedial
Investigation Report- Risk
Assessment

Dear Mr. Swale:

Staff have reviewed the above document and have the following comments:

1. Section 7.1.5.3.1.1, page 38, paragraph 1, discusses the total risk for off-site residents. When stating that "ingestion of arsenic and bis(2-chloroethyl) ether... contributes to a substantial portion of this risk", the "substantial portion" should be stated in percent or fraction form to be consistent with the form used in the preceding paragraphs.
2. In section 7.2.4, page 56, paragraph 4, the background concentrations for metals are referenced. We have no problem with the use of these background concentrations though we do think that the location of the background sampling sites need to be clearly stated.

We find this Risk Assessment to be generally well thought out and complete. Thank you for the opportunity to contribute our comments. If you have any questions or need clarification of these comments, please feel free to contact Project Manager, Rudy Thurman, at AC 317/243-5167.

Very truly yours,

Reggie A. Baker Jr. For ROB

Reggie Baker Jr., Chief
Superfund Section
Office of Environmental Response

RT/rt

An Equal Opportunity Employer